

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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DIRECT REPORT CORPORATION d/b/a		)	
SHAREHOLDER.COM,		)	
		)	
Plaintiff,		)	
v.		)	Civil Action No. 04-10535-PBS
		)	
CCBN.COM, INC., THE THOMSON		)	
CORPORATION, ROBERT I. ADLER,		)	
JOHN DOES 1 THROUGH 5,		)	
AND JANE DOES 1 THROUGH 5,		)	
		)	
Defendants.		)	
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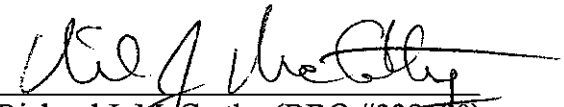
**DEFENDANT ADLER'S OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO SHARE CONFIDENTIAL  
INFORMATION WITH THE ATTORNEY GENERAL'S OFFICE**

Defendant Robert Adler ("Adler") hereby opposes the motion by Plaintiff Direct Report Corporation d/b/a Shareholder.com ("Shareholder") for leave to share documents obtained during discovery that Shareholder agreed should be designated as "Confidential" with the Attorney General's Office. As set forth more fully in a supporting memorandum, Shareholder's proposed disclosure would serve no valid discovery purpose and would violate the terms of the Stipulated Protective Order. Additionally, its motion, filed six days before the commencement of a long-scheduled mediation, is a transparent, and improper, attempt to affect this private civil litigation by raising the prospect of a reopened criminal investigation.

WHEREFORE, this Court should deny Shareholder's motion.

ROBERT ADLER,

By his attorneys,

  
Richard J. McCarthy (BBO #328600)  
Mark B. Dubnoff (BBO # 637212)  
EDWARDS & ANGELL, LLP  
101 Federal Street  
Boston, MA 02110  
Tel. (617) 439-4444  
Fax (617) 439-4170

Dated: July 22, 2005

ALL INFORMATION CONTAINED  
HEREIN IS UNCLASSIFIED  
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